

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

RECEIVED

2012 SEP 24 PM 1:16

THOMAS M. COULD
CLERK, U.S. DISTRICT COURT
W.D. OF TN MEMPHIS

Frances D. Wright

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

Vatterott College

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Frances D. Wright-Moore
(name of plaintiff)

is a citizen of the United States and resides at 6767 Castlegate Cove
(street address)

Memphis U.S.A. TN
(city) (country) (state)

38141 901-485-2028
(zip code) (telephone number)

3. Defendant

Vatterott College DBA LeCole Culinaire

(defendant's name)

lives at, or its business is located at

POB 28269 Olivette, MO 6332

(street address)

4. Plaintiff sought employment from the defendant or was employed by the defendant at
LeCole Culinaire 1245 N. Germantown Pkwy
Cordova U.S.A. TN 38016
 (city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 26 August 2010

(day)

(month)

(year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 26 August 2010

(day)

(month)

(year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 26 August 2010

(day)

(month)

(year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 6. (Attach a copy of the notice to this complaint.)
 (day) (month) (year)

9. Because of plaintiff's (1) ☒ race, (2) ☐ color, (3) ☐ sex, (4) ☐ religion, (5) ☐ national origin, defendant

(a) ☒ failed to employ plaintiff.(b) ☒ terminated plaintiff's employment.(c) ☐ failed to promote plaintiff.(d) ☐

I filed a charge w/ EEOC after accepting the position. As soon as Vattier/Lecole learned of my filing they ~~retaliated~~ retaliated. They cut my hours, and begin to harass me. In Jan 2011 they fired me saying that they did not need me because the student enrollment did not ^{warrant} ~~necessitate~~ it. They however hired a female white Chef- Martha Braum to work the poetry class that was once my class.

10. The circumstances under which defendant discriminated against plaintiff were as follows: *I was hired by LeCoke July 2009 as an pastry-chef. I studied at the French Pastry School in Chicago where I earned a degree (certificate) not an associate. In Dec 2010 I resigned because of racial undertones I was not willing to deal with, I was the only black chef on line ~~even though~~ the person who hired me Lashon Thomas (black female). In July 2010 Lashon was promoted in head Program Director called me & asked if I wld ret and work for them again. I agreed with the stipulation only if she cld make me full-time. She sd she cld do that & wld call me back after she spk w/ home office, she needed to get my files reopened. She called back sd I had been approved for full-time w/ a starting salary by SSK. I was to come in & sign of, when I ret'd from out of town. When I arrived to sign she sd she wld not be able to offer me full time because I did not have an associates degree. When I inquired about a few of the other white employees who were full-time & no associate degrees*

11. The acts set forth in paragraph 9 of this complaint

- (a) ☒ are still being committed by defendant. *she cld not explain, but only tried to justify the reason.*
- (b) ☐ are no longer being committed by defendant. *(over)*
- (c) ☐ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) ☐ Defendant be directed to employ plaintiff, or
- (b) ☐ Defendant be directed to re-employ plaintiff, or
- (c) ☐ Defendant be directed to promote plaintiff, or;
- (d) ☐ Defendant be directed to Pay restitution and back pay for job loss.

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes (✓) No ()

Frances D. Wright-Moore
SIGNATURE OF PLAINTIFF